

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF RHODE ISLAND**

In Re: Kristin M. Allard

Debtor

Charles A. Pisaturo, Jr.,  
Chapter 7 Trustee

Plaintiff

V.

Theresa Primo and  
Janis A. Goneconte,

## Defendants

Chapter 7  
No. 18-10820

A.P. No. 19-01008

**DECLARATION IN SUPPORT OF PLAINTIFF'S APPLICATION  
TO CLERK FOR ENTRY OF DEFAULT**

The Plaintiff, by his counsel, hereby declares and notifies the Court that:

1. As represented in the previously filed certificate of service to the Summons issued in this action, a copy of such Summons along with the accompanying Complaint commencing this adversary proceeding were properly served upon all Defendants, including upon Theresa Primo by mailing a copy of such Summons and Complaint by first-class mail, postage prepaid addressed to her at her dwelling, house or usual place of abode;

2. The Plaintiff has not been served with an answer or other response to the Complaint by Defendant Theresa Primo, which such Defendant was required to serve upon Plaintiff's counsel by April 12, 2019; and

3. The Plaintiff and his counsel are otherwise unaware of any answer or other

response to the Complaint having ever been served upon them or filed with this Court by Theresa Primo.

I hereby certify under penalty of perjury that the foregoing is true and correct. Executed on May 7, 2019 (28 U.S.C. §1746).

Charles A. Pisaturo, Jr., Chapter 7 Trustee  
By his Attorney,

/s/ Matthew J. McGowan

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